

FILED
JAMES BONINI
CLERK

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

07 MAR 23 PM 2:54

GRADUAL TAYLOR : Case No. C-1- 02-446
Plaintiff, : (Judge Weber)
: (Magistrate Black)

V,

CHERYL HART :
Defendant

Motion against order of Contempt for Sheila Taylor

Mr. Taylor has asked for time to acquire an attorney to protect his family from the three clever attorneys who are defending Mrs. Hart. The Taylor family was injured by the malicious actions of Mrs. hart and her attorneys are attempting to use their skills to out maneuver them. Mr. Taylor filed this request with this court and sent a copy to lead attorney Richard Ganulin before the scheduled 2nd set of interrogatories for Mrs. Taylor. The Attorneys for Mrs. Hart interviewed Mrs. Taylor for about one hour and a half. She was as open and honest as she could be. She told them everything that she could about her situation until there was nothing left. She told them, all that she could, having not been a part of the initial situation. In doing this she also told them that she was afraid and hated to drive down town. Mr. Taylor drove her for the first appointment and was out of town for the second one. In the request for a letter of contempt by the attorneys for Mrs Hart state, that it was agreed for a second meeting and that was not true. Mrs Taylor told them that she could not afford to take time off from her job to come back down to see them

again. We believe that the attorneys for Mrs. Hart are using this as a form of pressure to

Mr. and Mrs. Taylor, they are attempting to put the family in a hardship. Mrs. Taylor told

the attorneys for Mrs. hart that she did not have the materials that they requested and did the best that she could and that is all that she could do. And by using the name Taylor they are attempting to cause confusion as to which Taylor that they are talking about.

We are sure that if the court were to inspect the deposition of Mrs. Taylor they would see that she was as open and forth coming as you could hope for.

Respectfully submitted

Gradual Taylor Pro Se

A copy of this motion has been to sent to Richard Ganulin, attorney for Cheryl Hart, by regular mail.

Gradual Taylor